

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

FAIR ISAAC CORPORATION, a)	Case No. 16-cv-1054 (WMW/DTS)
Delaware corporation,)	
)	
Plaintiff,)	
)	
v.)	
)	
FEDERAL INSURANCE COMPANY,)	
an Indiana corporation, and ACE)	
AMERICAN INSURANCE)	
COMPANY, a Pennsylvania)	
corporation,)	
)	
Defendants.)	

**DECLARATION OF HEATHER J. KLIEBENSTEIN IN SUPPORT OF
PLAINTIFF FAIR ISAAC CORPORATION'S MEMORANDUM IN
OPPOSITION TO DEFENDANT'S MOTION TO EXCLUDE EXPERT REPORT
AND TESTIMONY OF BROOKS HILLIARD**

I, Heather J. Kliebenstein, declare as follows:

1. I am a shareholder with Merchant & Gould P.C., and I am one of the attorneys of record for Plaintiff Fair Isaac Corporation in the above captioned matter.
2. I make this declaration on my own information, knowledge, and belief in support of Plaintiff's Memorandum in Opposition to Defendant's Motion to Exclude Expert Report and Testimony of Brooks Hilliard.
3. Attached hereto as Exhibit 1 is a true and correct copy of an excerpt of the transcript of the June 19, 2019 deposition of Brooks Hilliard. This document is filed

UNDER SEAL.

4. Attached hereto as Exhibit 2 is a true and correct copy of the Expert Report of Steven R. Kursh, dated May 17, 2019. This document is filed UNDER SEAL.

Dated: August 26, 2019

/s/ Heather J. Kliebenstein
Heather J. Kliebenstein